

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	Case No. 4:19-cv-00415
v.	)	
	)	
ALEXANDRU BITTNER,	)	
Defendant.	)	

**MOTION TO WITHDRAW AS COUNSEL**

Pursuant to E.D. Texas Local Rule CV-11(c), Theodore Joshua Wu, co-counsel for Defendant in the above-captioned case, respectfully requests this Court to grant him leave to withdraw as counsel for defendant, and in support thereof, states as follows:

1. Plaintiff filed its Complaint on June 6, 2019 against Defendant
2. Defendant filed his Answer on July 30, 2019, listing Mr. Wu as appearing on behalf of Defendant along with Mr. Katz and Mrs. Rubenstein, all of the firm Clark Hill Strasburger.
3. Good cause exists for the filing of this Motion. Mr. Wu received an official offer to join the United States Department of Justice Tax Division in September 2019, and will join the Tax Division on or around October 14, 2019.
4. Pursuant to the Department of Justice Ethics Handbook, employees “should not engage in any outside employment or other activity that conflicts with your official duties and responsibilities.”
5. Mr. Katz and Mrs. Rubenstein of the same firm will continue to represent the defendant in this matter.

6. This withdrawal of counsel has been agreed to by Defendant, and is not sought for purposes of delay.

For the reasons set forth above, the undersigned counsel respectfully requests this Court to enter an Order granting his Motion to Withdraw as Counsel for defendant. A proposed Order is included in this submission.

Dated: September 30, 2019

Respectfully submitted,

By: /s/ Theodore Joshua Wu  
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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 30, 2019, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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